

REMARKS

In view of both the amendments presented above and the following discussion, the Applicants submit that none of the claims now pending in the application is obvious under the provisions of 35 USC § 103. Thus, the Applicants believe that all of these claims are now in allowable form.

If, however, the Examiner believes that there are any unresolved issues that necessitate adverse final action in any of the claims now pending in the application, the Examiner is urged to telephone Mr. Peter L. Michaelson, Esq. at (732) 530-6671 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Status of pending claims

Claims 106-108 have each been amended. No other claims have been amended; no claims have been canceled or added.

Rejection under 35 USC § 103

The Examiner rejected claims 3-10, 12-18, 20-25, 27-33, 35, 37-44, 46-52, 54-59, 61-67, 71-78, 80-86, 88-93, 95-102 and 104-108 under the provisions of 35 USC § 103 as being obvious over the teachings in the Judson patent (United States patents 5,737,619 issued on April 7, 1998 to D. H. Judson) taken in view of the Capek et al patent (United States patent 6,094,677 issued on July 25, 2000 to P. G. Capek et al) and the Merriman et al patent (United

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States patent 5,948,061 issued September 7, 1999 to D. A. Merriman et al). This rejection is respectfully traversed.

The Examiner first cites to various teachings in the Judson '619 patent as to interstitial advertising, specifically the use of code in a requested web page that results in the interstitial display of an advertisement.

With Judson's teachings in mind, the Examiner then turns to the Merriman et al '061 patent. He states that the latter patent discloses the concept of using embedded code within a web page that, when executed, causes ads (information objects) such as images, audio or video to be downloaded. To this extent, the Examiner is certainly correct.

Furthermore, the Examiner notes, with reference to column 3 of the Merriman et al '061 patent, that this patent teaches that "The browser-executed requested web pages cause retrieval and display of the page content from the content server. ... The ad server selects the ad to be downloaded and does so by decoupling the ad content/selection/location from the webpage content."

Given this, the Examiner then opines that "it would have been obvious to one of ordinary skill at the time of the invention to have included such coding/ad tags with the pages of Judson so that user-specific ads could be selected for local caching and subsequent interstitial display". Coupling this view with various teachings taken from the Capek et al '677 patent, directed to interstitial display and remote ad selection, the Examiner ostensibly

concludes, though without specifically so stating, that the combination of these teachings renders the Applicants' present invention obvious.

This conclusion is simply incorrect.

- A. The Merriman methodology does not decouple the ad content/selection/location from the webpage content and, in actuality, does just the opposite.

Of crucially importance, the Merriman et al '061 patent, while directed to Internet advertising, teaches an entirely different and diametric approach than that taught either by the Applicants or by the Judson and Capek patents. The Merriman et al '061 patent does NOT teach, mention or even inferentially suggest interstitial display.

As the Examiner will shortly realize, this fundamental operational difference and its legal ramifications completely rebut the Examiner's argument.

The Applicants have carefully summarized the relevant teachings of both the Judson and Capek et al patents in their prior amendments in this application, specifically those amendments mailed on January 22, 2002 and September 12, 2002. Hence, for the sake of brevity, the Applicants simply direct the Examiner back to those amendments for the pertinent discussion of those two references.

Now, in sharp contrast to interstitial advertising where an advertisement is rendered in a so-called "interstitial" interval between successively displayed web

pages, the Merriman et al '061 patent is directed to "in-page" advertising -- with particular applicability to displaying banner ads. Through the Merriman approach, during access of a web page, an advertisement, typically a banner, is accessed from a remote advertising server and is then inserted by a user's browser into that page for subsequent display as a composite web page to the user, i.e., the ad is embedded into the page before that page is displayed. In that regard, this patent expressly states at col. 2, line 65 et seq.:

"When a user using a browser accesses or 'visits' a web site of an affiliate, an advertisement provided by the advertisement server 19 will be superimposed on the display of the affiliate's web page displayed by the user's browser." [emphasis added]

As the Examiner can surely appreciate, interstitial ad display pointedly differs from "in-page" advertisements in that the display of a web page (commonly called a "referring" web page) which triggered download of an interstitial advertisement, is not affected by the advertisement itself. The advertisement, as a stand-alone object, simply plays in an ensuing interstitial interval, i.e., after the referring web page has been rendered, and clearly NOT simultaneously with or within that page.

This very pronounced difference in display methodology has a marked effect on the viewing public. Banner ads are typically static (or have rather simple animation), consume part of a rendered page and add clutter to that page. As reflected by rather low-click rates,

viewers typically ignore such ads, and, more often than not, frequently find them rather annoying. Interstitial ads, on the other hand, are full-motion rich-media ads that generally play by themselves in a separate display window or screen. Because interstitial ads display rich media rivaling the viewing experience of television, these ads are far more pleasing to viewers, attract far more viewer attention and generate much higher user response rates than do banner ads.

Accordingly, those skilled in the art consider "in-page" (e.g., banner) advertising as fundamentally a very different and inferior form of Internet advertising than interstitial advertising. Hence, one seeking to overcome a problem inherent in interstitial display methodology would simply not turn to "in-page" ad techniques for a solution.

That having been said, we now turn to discussing the specific teachings in the Merriman et al '061 patent itself.

In col. 3, line 24 et esq. and with reference to FIG. 1 of this patent, the Merriman methodology begins with downloading from affiliate web site 12, to user's browser 15, a web page, which, when rendered, is to display an embedded advertisement, such as a banner. However, the web page, as downloaded, does not contain the ad itself. In place of the ad, the page contains a link, e.g., an HTML tag, with an IP (Internet Protocol) address and information about the particular page. The link specifies a network node which runs advertiser server process 19. As explicitly stated in col. 3, lines 38-41, this tag refers to, e.g., an

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in-line ad image, such as a banner, or more generally speaking an object:

"The link by way of example may be a hypertext markup language (HTML) tag, referring to, for example, an inline image such as a banner."

and as more generally stated in col. 2, lines 19-23:

"When, for example, a user using a web browser accesses a web page that is affiliated with the advertising server process, *the affiliate page's encoding includes an embedded reference to an object* provided by the advertising server process." [emphasis added]

When the user's browser, during its course of interpreting the page, executes the link, the browser, in turn, sends a message to the IP address to access, from advertising server 19, the object indicated by the HTML tag. In that regard, the patent expressly states at co. 3, line 41 et esq.:

"The user's browser 16 then transmits a message 23 using the received IP address *to access such an object indicated by the HTML tag from the advertisement server 19.*"

That message includes various browser and user specific pieces of information, expressly stated in col. 3, line 44 et esq. as:

"Included in each message 23 typically to the advertisement server 19 are: (i) the user's IP address, (ii) a

cookie if the browser 16 is cookie enabled and stores cookie information, (iii) a substring key indicating the page in which the advertisement to be provided from the server is to be embedded, and (iv) MIME header information indicating the browser type and version, the operating system of the computer on which the browser is operating and the proxy server type." [emphasis added]

Upon receipt of request 23, the advertising server process 19 then determines the specific advertisement (or other object), e.g., a specific image if that is to be displayed as an ad, that is to be provided back to user's browser 16, accesses that object from the server's own storage, and then transmits a message 24 containing that specific advertisement. The advertisement is inserted into the page with a resulting composite page containing the object being displayed to the user. See col. 3, lines 52-62 which recite in pertinent part:

"Upon receiving the request in the message 23, the advertising server process 19 determines which advertisement or other object to provide to user's browser and transmits the messages 24 containing the object such as a banner advertisement, to the user's browser 16 using the HTTP protocol. ... That advertisement object is then displayed on the image created by the web user's browser as a composite of the received affiliate's web page plus the object transmitted back by the advertising server." [emphasis added]

Once the composite page is displayed, the user can then click through the displayed advertisement to obtain more

information. When such a click-through occurs, the user's browser sends a message to the advertising server process which ultimately causes re-direction of that browser to the advertiser's web site.

Although this patent teaches that the advertising server process determines the specific advertising object to download to the user's browser in response to execution of the embedded code in the web page, this teaching must be interpreted consistently with regard to the express language, reproduced above, at col. 2, lines 19-23 and col. 3, lines 38-41, which characterizes that code, as including an "embedded reference to an object". Given this, a careful reading of the '061 patent seems to admit only one plausible, consistent interpretation: the embedded code must also specify a general characteristic (type) of the advertisement object, e.g., an image, with the specific object of that type then being selected by and downloaded from an advertising server process (19) and ultimately displayed as part of that page.

As the Examiner can now readily appreciate, the Merriman methodology, by virtue of embedding code, within a web page, that specifies: (a) an IP address of a server which stores the advertising object, and (b) some characteristic of that object, even though the specific object itself will be selected by and downloaded from the server, nevertheless couples that object to that page. In essence, the page contains a reference, both in terms of location (IP server address) and type (however general the latter is) to that object. It is just that simple. No other interpretation is credible.

Hence, this rather express teaching of the Merriman et al '061 patent clearly contradicts the Examiner's stated view which forms a basis of the present rejection: "The ad server selects the ad to be downloaded and does so by decoupling the ad content/selection/location from the webpage content [col. 3]". In light of the express language quoted above from the Merriman et al '061 patent, in actuality, the ad server does not decouple the content, selection and location of the advertisement object from the web page -- as the web page, by virtue of its embedded code, is already coupled to both the location (server address) of the object and, at least in a general sense, the type of object which that page will ultimately display. By virtue of that coupling, the object will be displayed within the rendering page that contains the embedded code, but can not and will not be displayed by any other page that does not contain this code. Hence, if an advertiser, using this methodology, needed to change that object, in terms of using an object of a different type, or its location (i.e., to access a different server), then, in all likelihood, he may very well need to change the code as well and hence modify the web page -- a fundamental deficiency which the Applicants' present invention advantageously avoids.

In sharp contrast to the Merriman approach, the present invention completely decouples the content of the web page (i.e., the "referring" web page) from an object that will be downloaded and interstitially rendered. The Applicants' embedded code is completely devoid of any reference whatsoever to the object whether it be in terms of its content, location or any constituent file.

The flexibility gained through the present invention, namely of eliminating any need to change a referring web page if its associated advertisement (or more generally information object) is to be changed, whether in terms of its content, constituent files or location, by eliminating any coupling whatsoever between that page and the object, is glaringly missing from the teachings of Merriman et al '061 patent. Contrary to what the Examiner might think, the teachings of this patent simply fall far short of the mark.

- B. No one of ordinary skill in the art would turn to the Merriman teachings to rectify the deficiency inherent in the combined teachings of the Judson and Capek et al patents.

Furthermore, as previously discussed by Applicant Landsman during the interview with the Examiner held on September 17, 2003 and as illustrated in the PowerPoint presentation which Mr. Landsman used during that interview (which were also subsequently supplied to the Examiner), any combination of the teachings of the Judson '619 and Capek et al '677 patents results in a interstitial display methodology having a fundamental inherent drawback: a 1:1 pre-defined static mapping, as taught by Judson, exists between the content of the referring page and the interstitially displayed object, i.e., the tag specifies the particular object to be displayed. The object, as taught by the Capek et al patent, can be stored remotely on and accessed from an insertion manager situated effectively in series, as a proxy server, between the user's browser and

external web servers. If the object is to change, then the tag must change and hence so must the referring web page.

The problem simply becomes, to one of ordinary skill in the art, how to provide an enhanced interstitial display methodology that does not require any changes to the referring web page whenever the object itself, in terms of its location, content or constituent files, changes.

Fundamentally and even apart from the basic distinctions discussed above between Merriman's approach and that taught by the Applicants, no person of skill when faced with that problem would think to turn to a markedly different and inferior approach, i.e., "in-page" ad display, such as that typified by the Merriman et al '061 patent, for a solution.

Should one do so and consider the teachings of that patent, it quickly becomes evident that the Merriman patent contains absolutely NO teachings, express or implied, about interstitial advertising. This patent is simply silent on that point. It is even devoid of any suggestion that its teachings could be applied in an interstitial environment.

- C. No motivation has been shown in the art to support combining the teachings of the Judson, Capek et al and Merriman patents, hence negating the Examiner's obviousness rejection predicated thereon.

In order to render an invention obvious in view of a purported combination of prior art references, Federal Circuit decisions consistently require that there must be

some teaching, suggestion, or, more generally speaking, motivation in the art to combine the references. *Akamai Technologies Inc. v. Cable & Wireless Internet Services, Inc.* 68 USPQ2d 1186, 1193 (Fed. Cir. 2003); also *In re Lee* 61 USPQ2d 1430, 1433 (Fed. Cir. 2002). Furthermore, there also must be a reasonable expectation of success resulting from the combination. *Boehringer Ingelheim Vetmedica Inc. Schering-Plough Corp.* 65 USPQ2d 1961, 1971 (Fed. Cir. 2003)

The suggestion more often than not comes from the teachings of the pertinent references or from the ordinary knowledge of those skilled in the art that certain references are of special importance in a particular field. *Akamai* at 1193.

The existence of such a motivation is a question of fact. However, a factual inquiry must be thorough and searching and based on objective and specific evidence of record. *Ibid.* Subjective belief of unknown authority will not suffice.

"This factual question of motivation is material to patentability, and could not be resolved on subjective belief and unknown authority. It is improper, in determining whether a person of ordinary skill would have been led to this combination of references, simply to '[use] that which the inventor taught against its teacher'."

Id at 1434 and citing to the Federal Circuit's prior decision in *W. L. Gore v. Garlock, Inc.* 220 USPQ 303, 312-313 (Fed. Cir. 1983).

The necessity of proving the existence of motivation through the existence of definitive factual proof stems from the relative ease through which a fact-finder assessing obviousness can view the teachings of the combined prior art references from the impermissible perspective of hindsight -- however unintended and inadvertent reliance on that perspective might be. Hindsight invariably leads to a finding of obviousness for the simple reason that most, if not all inventions, arise from a combination of old elements, and such combinations, assessed through the inventor's teachings, will invariably seem obvious in hindsight. Hence, identification in the prior art of each individual part claimed is insufficient in and of itself to defeat patentability. Consequently, some definitive proof of a motivation taught in the art which indicates the desirability of making the specific claimed combination is essential to defeat patentability. *In re Kotzab* 55 USPQ2d 1313, 1316 (Fed. Cir. 2000).

Properly discerning motivation in the art is particularly problematic during patent examination where an examiner invariably gains prior knowledge of the claimed invention before examining the prior art and, not surprisingly, has his(her) opinion of the art influenced, however subtly it might be, by that knowledge. In essence, once an examiner gained that knowledge, it is often rather difficult, if not impossible, for that person to completely divorce him(her)self from it in order to assess whether in fact such a motivation exists or not without relying on some degree of hindsight. Yet, this is exactly what the examiner must do, namely, place him(her)self back in the shoes of the inventor at the time the claimed invention was made and

gauge only what the art and accepted wisdom taught at that particular time and just at that time. The Federal Circuit re-iterated this analytic framework by stating in *Kotzab* at page 1316:

"A critical step in analyzing the patentability of claims pursuant to section 103(a) is casting the mind back to the time of invention, to consider the thinking of one of ordinary skill in the art, guided only by the prior art references and the then-accepted wisdom in the field. ... Close adherence to this methodology is especially important in cases where the very ease with which the invention can be understood may prompt one 'to fall victim to the insidious effect of a hindsight syndrome wherein that which only the invention taught is used against its teacher'." [quoting from *W. L. Gore* at 313; other citations omitted]

Having recognized the very real danger inherent in any hindsight-based analysis, the Federal Circuit strove to circumvent the deleterious results of such analyses by stating in *Lee* at page 1433 the need to rigorously require that motivation to combine be shown in the art:

"Our case law makes clear that the best defense against the subtle but powerful attraction of a hindsight-based obviousness analysis is rigorous application of the requirement for a showing of the teaching or motivation to combine prior art references." (citations omitted)

To succeed, an examiner is constrained to show motivation to combine prior art references through objective

and specific evidence. In that regard, the Federal Circuit stated:

"[P]articular findings must be made as to the reason the skilled artisan, with no knowledge of the claimed invention, would have selected these components for combinations in the manner claimed." *Lee* at 1433 citing to *Kotzab* at 1317.

Regarding the specific burden imposed on the examiner, the Federal Circuit again in *Lee*, citing to its prior decision in *In re Fitch* 23 USPQ2d 1780, 1783 (Fed. Cir. 1992), remarked at page 1434:

"[T]he examiner can satisfy the burden of showing obviousness of the combination 'only by showing some objective teachings in the prior art or that knowledge generally available to one of ordinary skill in the art would lead that individual to combine the relevant teachings of the references'."

While a motivation to combine can be shown from explicit teachings in the art, that is not its only source. Motivation can arise through knowledge of one of ordinary skill in the art or, in some cases, from the nature of the problem to be solved. Further, the teaching, motivation or suggestion may be implicit in the prior art as a whole, rather than expressly stated in the references. The test for an implicit showing is what the combined teachings, knowledge of one of ordinary skill in the art, and the nature of the problem to be solved as a whole would have suggested to those of ordinary skill in the art. However, broad conclusory statements standing alone are not

"evidence". *Kotzab* at 1317. See also *Akamai* at 1193; and *Brown & Williamson Tobacco Corp. v. Philip Morris Inc.* 56 USPQ2d 1456, 1459 (Fed. Cir. 2000).

Now, rigorously applying this analytic framework to the Examiner's purported combination -- as the Federal Circuit dictates one must -- in the present application yields one and only one inescapable conclusion: the art is utterly devoid of any motivation to combine the teachings of the Judson, Capek et al and Merriman et al patents, let alone in the manner suggested by the Examiner.

The reasons are simple.

First, as discussed above, the Merriman et al '061 patent is directed to an entirely different and diametric form of internet advertising, i.e., "in-page", than is both the Judson and Capek et al patents. Those skilled in the art not only recognize that "in-page" advertising and interstitial advertising widely differ, but also that the former is decidedly inferior to the latter. No one of skill when faced with overcoming a deficiency with interstitial advertising -- as inheres in the combined teachings of the Judson and Capek et al patents -- would likely consider teachings from a different and inferior methodology, i.e., "in-line" advertising. Yet, that is exactly the field to which the Examiner turns when he considers and imports the teachings of an element (embedded code) from the Merriman methodology, purportedly missing from the Judson-Capek et al combination, into that very combination.

Second, the Merriman et al patent is utterly devoid of any specific hint, disclosure or suggestion, whether express or implicit, which would indicate to one of skill that Merriman's teachings could be extended to the interstitial environment. The patent is solely concerned with "in-page" advertising and nothing else.

As discussed above, the Federal Circuit has repeatedly and strongly cautioned against defeating patentability through obviousness by importing elements from the prior art into a combination without finding a clear and express motivation to combine in the art, the accepted wisdom or even in the nature of the problem. Yet, this is exactly what the Examiner has done.

The Examiner's apparent inability to point to any definitive factual proof showing the presence of a motivation to make the purported combination leaves the Applicants with one inconvertible conclusion: the Examiner, however unintentional, must have been influenced in selecting and incorporating an element from the Merriman et al '061 patent into his combination of the Judson and Capek et al patents through knowledge he previously gained of the present invention. Such an analysis, being based on hindsight, is impermissible and the resulting purported combination of all these references must necessarily fail.

The Examiner has simply not met his prima facie burden in proving obviousness based on combining the Judson, Capek et al and Merriman patents.

- D. Notwithstanding the lack of any motivation in the art to combine the teachings of the Judson, Capek et al and Merriman patents, any such combination would not solve the deficiency inherent in that combination.

Notwithstanding whether sufficient motivation exists to combine the teachings of the Merriman et al '061 patent with those in the Judson and Capek et al patents, let us now assume arguendo that one of skill in the art would indeed consider doing so.

Upon sufficient reflection, that person of skill would quickly realize the specific teachings in the Merriman patent totally fail to remedy the problem inherent in the combined teachings of the Judson and Capek et al patents -- a deficiency which the Applicants and only the Applicants advantageously eliminate.

Specifically, as discussed in detail above, the coupling between the embedded code and the object, as employed in the Merriman approach, mandates that if an advertiser were to change either: (a) the server on which that object resides, or (b) the type of object to be displayed "in-page", then the code and hence the web page must be modified accordingly. This deficiency, as discussed above but to a much greater extent, inheres in any approach that results from combining the teachings of just the Judson '619 and Capek et al '677 patents. There, the tight 1:1 coupling, in the code, between the object itself and the web page as disclosed by the Judson patent necessitates that if the advertiser desired to access a different object, i.e., one with a different file name, through a referring web page (regardless of whether that object is located on the same

server or is of the same type as a prior object), then the code and hence the web page must necessarily change (assuming the advertiser will not modify the contents of the object file itself to reflect a desired change). While the Merriman patent ameliorates the deficiency to some extent, it fails to completely eradicate it. As such, rather than teaching the Applicants' inventive solution, the teachings of the Merriman patent actually fall far short of it.

Since the Applicants' embedded code (more specifically an advertising tag) is completely devoid of any reference whatsoever to the object whether it be in terms of its content, location or any constituent file, that tag does not reflect any pre-defined mapping between the referring page and any aspect of the object and hence can be associated with any one (1:n) of an infinite number of objects regardless of where those objects are located. Advantageously, the absence of any such mapping substantially, if not totally, frees an advertiser from any need to modify any of its referring web pages in the event any aspect of its advertisement object were to change.

This inventive concept is simply not taught, disclosed or even inferentially suggested by the applied art.

E. Thus, the present invention is simply not obvious in view of the Judson, Capek et al and Merriman patents; hence, the Applicants' present claims are patentable under 35 USC § 103.

Consequently, the result is clear: it has remained for the Applicants and only the Applicants to teach their

present invention, particularly the use of their inventive embedded code (specifically their advertising tag) and its ability to completely decouple content of a referring web page from an object that is to be interstitially displayed as a result. No one else has merely suggested doing so, let alone actually done so.

The Applicants submit that each of their independent claims, as it stood prior to this amendment, contained sufficient recitations that effectively distinguished over the teachings of these three applied patents. Nevertheless, to expedite prosecution, the Applicants have now amended each of these claims to further distinguish their claims from the teachings of the applied references by incorporating additional limitations directed to interstitial display and decoupling of the content of referring (first) web page, as stored in or rendered by the client browser, from the interstitially rendered object (specifically its constituent files or corresponding locations) -- concepts not taught or suggested by any of the applied references.

Specifically, claim 106, as presently amended, recites as follows, with its distinguishing limitations indicated by a bolded typeface.

"A computer readable medium storing a first web page wherein the first web page comprises a plurality of computer readable instructions, **the instructions representing page content and containing embedded code, wherein the code, when executed by a client computer during processing the instructions on the web**

page results in an interstitial display of an information object by causing the computer to:

communicate a request to a network server;

as a result of the request, download, from a management server different from the network server and while the computer renders the first web page to a user through an output device operative in conjunction with the computer, at least one file which is to be subsequently employed, by the processor, to interstitially render the information object, the information object being selected by the management server; and

in response to a user-initiated event, detected by the computer, for transitioning from the first web page to a next successive web page and which signifies a start of a next interstitial interval, suspend further downloading of files and process the one file so as to render the information object through the output device to the user during the interval and separately from the first web page; and

wherein neither the code nor the first web page references the information object or said at least one file, specifies a location of the object itself or said at least one file or contains any content from the object or said at least one file such that use of the code eliminates a need to include content for the information object or said at least one file or an address of the object or said at least one file within the first web page, when the first web page is stored or rendered, thereby substantially decoupling the object and said at least one file from the first web page itself."

[emphasis added]

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Highly similar and parallel distinguishing recitations have now been added to each of the Applicants' other independent claims, specifically claims 107 and 108.

As such, the Applicants submit that each of their independent claims, namely claims 106, 107 and 108, is not rendered obvious by the teachings in the Judson '619, Capek et al '677 and Merriman et al '061 patents, whether taken singly or in the combination posed by the Examiner.

Accordingly, the Applicants submit that each of their independent claims is patentable under the provisions of 35 USC § 103.

Each of the remaining claims, specifically claims 3-10, 12-18, 20-25, 27-33, 35, 37-44, 46-52, 54-59, 61-67, 69, 71-78, 80-86, 88-93, 95-102 and 104 and 105, depends, either directly or indirectly, from independent claim 106, 107 or 108 and recites further distinguishing features of the present invention. Therefore, the Applicants submit that each of these dependent claims is patentable over the teachings of these three applied patents for the same exact reasons set forth above. Hence, the Applicants submit that each of these dependent claims is also patentable under the provisions of 35 USC § 103.

Conclusion

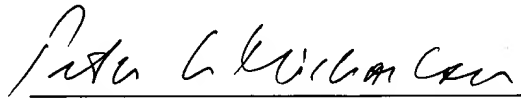
Thus, the Applicants submit that none of the claims, presently in the application, is obvious under the provisions of 35 USC § 103.

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Consequently, the Applicants believe that all these claims are presently in condition for allowance. Accordingly, favorable consideration of this application and its swift passage to issue are both earnestly solicited.

Respectfully submitted,

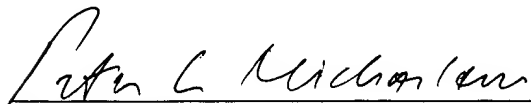
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